May 4, 2023

U.S. Consumer Product Safety Commission
Submitted via: www.regulations.gov;

RE: CPSC RFI Response, Docket No. CPSC-2023-0009

Dear Members of the U.S. Consumer Product Safety Commission:

On behalf of the American Public Health Association, a diverse community of public health professionals that champion the health of all people and communities, I thank you for the opportunity to provide input on the U.S. Consumer Product Safety Commission’s RFI on Chronic Hazards Associated With Gas Ranges and Proposed Solutions. We are pleased to provide our views regarding the public health concerns related to gas ranges.

Gas stoves generate several harmful air pollutants, with nitrogen dioxide most consistently identified in the scientific literature. Multiple high-quality scientific studies have shown that NO2 concentrations are higher in homes that use gas stoves and that cooking with gas stoves without ventilation can result in home NO2 concentrations that are above the ambient air quality standards of the U.S. Environmental Protection Agency. Epidemiological studies have shown that gas stoves are associated with an increased risk of asthma in children as well as more severe asthma symptoms. Despite this evidence, few safeguards are in place to protect the health of the public from gas stove emissions, particularly in overburdened and underserved communities.

In 2022, APHA adopted a policy statement on the topic at hand, titled “Gas Stove Emissions Are a Public Health Concern: Exposure to Indoor Nitrogen Dioxide Increases Risk of Illness in Children, Older Adults, and People with Underlying Health Conditions.” We are submitting this policy statement in response to CPSC’s RFI. Based on the evidence presented in the policy statement, APHA calls upon CPSC to set mandatory or voluntary performance standards for gas stoves and range hoods and to launch a public awareness campaign.

Thank you again for the opportunity to provide feedback on CPSC’s RFI. Please feel free to contact me with any questions regarding APHA’s policy statement or position on this issue.

Sincerely,

Georges C. Benjamin, MD
Executive Director